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March 22, 2016

VIA ECF

The Hon. Judge P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *Mickey Bahr v. PNW Enterprises, LLC d/b/a New York Kids Club, 16 CV 1223*

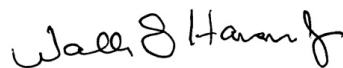
Dear Judge Castel:

We represent the Plaintiff Mickey Bahr in the above-referenced employment action. We write to respectfully request an adjournment of the Initial Pretrial Conference, presently scheduled for April 14, 2016, at 11:00 a.m., and to inform the Court of Plaintiff's intention to file a Notice Motion pursuant to 29 U.S.C. § 216(b) once issue is joined.

Plaintiff's counsel will be out of the state and out of communication on a previously scheduled trip during the week of April 11 and, as a result, will be unavailable on April 14.¹ Plaintiff respectfully requests that the Court adjourn this conference for a time mutually convenient for the Court and the Parties. This request is Plaintiff's first request for an adjournment of this conference and in this action. Defendant's counsel consents to the adjournment. The adjournment does not affect any other scheduled dates. The Parties have met and conferred and are available on April 21, 2016 at 11:30 a.m. to appear for an Initial Pretrial Conference, if such date and time is convenient for the Court.

Thank you for your time and attention to this matter.

Respectfully submitted,



Walker G. Harman, Jr.

cc: Lloyd J. Weinstein (via ECF)

¹ Regarding Defendant's letter (Docket No.: 10), after Plaintiff submitted the Stipulation Extending Defendant's Time to Respond on behalf of Defendant (who had already exceeded the 21 days to answer or otherwise respond to the Complaint), Defendant informed Plaintiff that Defendant never received a copy of the February 19, 2016 Order (Docket No.: 5). Plaintiff immediately sent Defendant's counsel a copy of that Order and explained that his lapse was not intentional but due to an administrative oversight. Plaintiff took responsibility for the mistake, which has nothing to do with the instant motion to adjourn the Initial Pretrial Conference.